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REMARKS

Claims 1-29 of the application stand rejected. Claims 1, 5, 12, 20 and 21 have been amended herein to more clearly define the scope of the presently claimed invention. Applicant respectfully requests reconsideration of pending Claims 1-29 in light of the amendments and remarks herein.

35 U.S.C. § 112, second paragraph

Claim 20 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Examiner points out that the term "operational parameter" lacks antecedent basis. Applicants respectfully submit that Claim 20 has been amended to depend on Claim 16, and the term "operational parameter" has been changed to "operation parameters", a term introduced in Claim 16. Applicants therefore respectfully request the Examiner to withdraw the 35 U.S.C. § 112 rejection.

35 U.S.C. § 102

Claims 1-10, 12, 14, 20-23 and 25-27 stand rejected under 35 U.S.C. § 102 as anticipated by Lee, et al., U.S. Patent No. 6,463,175 (hereafter "Lee"). The Examiner submits that Lee teaches all the elements of independent Claims 1, 5, 12, 21 and 25. Applicants respectfully traverse the rejection.

The invention, as claimed in independent Claims 1, 5, 12, 21 and 25 is directed to a system, apparatus, method and article for feature based image correction. More specifically the elements of these independent claims include at least the features of a system, apparatus, method and/or article for automatically detecting a feature in an image based on a correction specification and correcting the feature based on the correction specification.

Lee, on the other than, describes a structure-guided image processing and image feature enhancement system (Lee, Abstract). The Examiner suggests that various portions of Lee disclose the elements of independent Claims 1, 5, 12, 21 and 25.

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Specifically, the Examiner states that Lee discloses an automatic feature-based correction mechanism that “automatically detects a predetermined feature from the input image (Col. 5, lines 16-19) and corrects the detected feature according to a correction specification (Col. 5, lines 22-40). The Examiner concedes that Lee fails to explicitly cite a “correction specification” but suggests that since Lee discloses that the feature correction is based on the feature type (Col. 10, lines 17-28), this qualifies as correcting the feature. Applicants strongly disagree.

Applicants respectfully submit that the Examiner incorrectly interpreted the contents of Lee. First, the sections in Col. 5 of Lee highlighted by the Examiner make no mention of automatically detecting features based on a correction specification. Applicants freely admit that manual selection of various portions of an image for image correction is known in the art (see Specification, Background, p. 2, lines 7-9). There is, however, no means by which features may be *automatically detected* from an image *based on a correction specification* and then corrected based on the correction specification. The sections highlighted by the Examiner in Col. 5 merely describe generally how the system in Lee extracts a feature from an image. There is no suggestion that this process is automated based on a correction specification. There is, in fact, no mention whatsoever of anything that may be construed as a “correction specification”.

The Examiner suggests that Col. 10, lines 17-28 qualifies as disclosing a “correction specification.” Applicants respectfully disagree. The language in this section makes no mention of features and/or corrections. Lee, Col. 10, lines 17-28 reads as follows:

“Those skilled in the art should recognize that the structure-guided feature enhancement process could start with grayscale opening followed by grayscale closing or start with grayscale closing followed by opening. Opening first will enhance dark features and closing first will enhance bright features. Each opening and closing iteration could use the same size structuring element for detailed feature refinement or could use an increased size structuring element for more aggressive feature refinement. Elongated structuring elements of orthogonal directions could be alternatively or sequentially applied in the enhancement processing sequence for multiple direction feature enhancement.”

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There is no mention in this section (or in any other section of Lee) of anything that could remotely be construed as a "correction specification", as the Examiner suggests. As such, Applicants respectfully submit that Lee does not teach all elements of independent Claims 1, 5, 12, 21 and 25 and therefore does not anticipate these claims. Similarly, since all claims dependant on Claims 1, 5, 12, 21 and 25 also incorporate these elements not taught by Lee, Applicants submit that Lee also does not anticipate dependant Claims 2-4, 6-10, 14, 20, 22, 23 and 25-27. Applicants therefore respectfully request the Examiner to withdraw the 35 U.S.C. § 102 rejections to pending Claims 1-10, 12, 14, 20-23 and 25-27.

35 U.S.C. §103

Claims 7, 11 and 24 stand rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee in view of U.S. Patent No. 6,026,181 ("Murakami"). Claims 15-17 and 28-29 stand rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee in view of U.S. Patent No. 6,292,575 ("Bortolussi"). Claim 18 stands rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee and Bortolussi in further view of Murakami. And finally, Claim 19 stands rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee and Bortolussi in further view of U.S. Patent No. 6,463,432 ("Murakawa"). Applicants respectfully traverse the Examiner's rejection to the remaining claims. Applicants respectfully traverse the rejections.

Applicants respectfully point out that all of these rejections are based on Lee in combination with other references. Since Claims 7, 11, 15-17, 19 and 28-29 are dependant on independent Claims 1, 5, 12, 21 and 25, the Examiner is apparently relying on Lee to teach all elements of independent claims 1, 5, 12, 21 and 25 and suggesting that the combination of Lee with the various other references renders the dependant claims unpatentable. Applicants respectfully submit that as described above, Lee does not teach all elements of the independent claims. Thus, without addressing the propriety of combining the cited references with Lee, Applicants submit that the combination of any of these other references (Murakami, Bortolussi and/or Murakawa) with Lee also does not teach all elements of the independent claims. Since the dependant claims incorporate

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all elements of the independent claims, these references, alone or in combination, cannot render any of the claims unpatentable. Applicants therefore submit that Claims 7, 11, 15-17, 19 and 28-29 are patentable over Lee, Murakami, Bortolussi and/or Murakawa, alone or in combination, and respectfully request the Examiner to withdraw the 35 U.S.C. §103 rejection to these pending claims.

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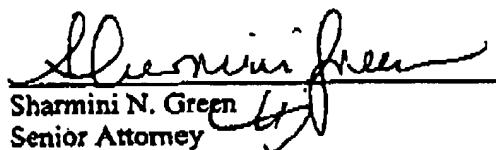
CONCLUSION

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-29 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (310) 406-2362.

If there are any additional charges, please charge Deposit Account No. 50-0221.

Respectfully submitted,

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Sharmini N. Green
Senior Attorney
Intel Corporation
Registration No. 41,410
(310) 406-2362